

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

One (1) residence,
as more fully described in Attachment A.

Case No. MJ22-026

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

One (1) residence, as more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. § 841(a)(1)

Offense Description

Distribution of, and Possession with Intent to Distribute, Controlled Substances

The application is based on these facts:

- ☒ See Affidavit of DEA Special Agent Joseph M. Parker continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

Applicant's signature

Joseph M. Parker, DEA Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 1/20/22

Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title

ATTACHMENT A

PROPERTY TO BE SEARCHED

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location described below.

Residence

Target Residence: The Target Residence is a single-story house, beige in color, positioned on the same lot to the rear of a blue single-story house (17022 35th Ave S, SeaTac, WA). The Target Residence has a purple picnic table directly out front of the front door. The Target Residence does not have any numerical markings on the front of the building. The Target Residence has a gray front door facing to the south. The Target Residence is positioned to the east of the blue single-story house.



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1 rental, income, expenses, or control of the Target Residence, and similar records of
2 other property owned or rented.

3 10. Indicia of occupancy, residency, and/or ownership of assets such as utility
4 and telephone bills, canceled envelopes, rental records or payment receipts, leases, and
5 mortgage statements.

6 11. Evidence of storage unit rental or access such as rental and payment
7 records, keys and codes, pamphlets, contracts, contact information, directions, and
8 passwords.

9 12. Evidence of Personal Property Ownership: Registration information,
10 ownership documents, or other evidence of ownership of personal property such as
11 vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and jewelry;
12 evidence of international or domestic travel, hotel stays, and other evidence of
13 unexplained wealth.

14 13. Individual and business financial books, records, receipts, notes, ledgers,
15 diaries, journals, and all records relating to income, profit, expenditures, or losses, such
16 as:

17 a. Employment records: paychecks or stubs, lists and accounts of
18 employee payrolls, records of employment tax withholdings and contributions,
19 dividends, stock certificates, and compensation to officers.

20 b. Savings accounts: statements, ledger cards, deposit tickets,
21 register records, wire transfer records, correspondence, and withdrawal slips.

22 c. Checking accounts: statements, canceled checks, deposit tickets,
23 credit/debit documents, wire transfer documents, correspondence, and register records.

24 d. Loan Accounts: financial statements and loan applications for all
25 loans applied for, notes, loan repayment records, and mortgage loan records.

26 e. Collection account statements and other-related records.

27 f. Certificates of deposit: applications, purchase documents, and
28 statements of accounts.

g. Credit card accounts: credit cards, monthly statements, and
receipts of use.

h. Receipts and records related to gambling wins and losses, or any
other contest winnings.

i. Insurance: policies, statements, bills, and claim-related
documents.

j. Financial records: profit and loss statements, financial statements,
receipts, balance sheets, accounting work papers, any receipts showing purchases made,
both business and personal, receipts showing charitable contributions, and income and
expense ledgers.

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2 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's
3 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money
4 wrappers, stored value cards, and other forms of financial remuneration evidencing the
5 obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of
6 money.

7 15. All Western Union and/or Money Gram documents and other financial
8 documents evidencing domestic or international wire transfers, money orders, official
9 checks, cashier's checks, or other negotiable interests that can be purchased with cash,
10 including applications, payment records, money orders, and frequent customer cards.

11 16. Negotiable instruments, jewelry, precious metals, and financial
12 instruments.

13 17. Documents reflecting the source, receipt, transfer, control, ownership, and
14 disposition of United States and/or foreign currency.

15 18. Correspondence, papers, records, and any other items showing
16 employment or lack of employment.

17 19. Phone books, address books, any papers or documents reflecting names,
18 addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile,
19 and/or telex numbers, telephone records and bills relating to co-conspirators, sources of
20 supply, customers, financial institutions, and other individuals or businesses with whom
21 a financial relationship exists; telephone answering devices that record telephone
22 conversations and the tapes therein for messages left for or by co-conspirators for the
23 delivery or purchase of controlled substances or laundering of drug proceeds.

24 20. Safes and locked storage containers, and the contents thereof which are
25 otherwise described in this document.

26 21. Tools that may be used to open hidden compartments in vehicles, such as
27 paint, bonding agents, magnets, or other items that may be used to open/close said
28 compartments.

29 22. Digital computing devices, *e.g.*, desktop and laptop computers and table
30 devices; digital storage devices, *e.g.*, external hard drives and USB thumb drives, and;
31 optical and magnetic storage media, *e.g.*, Blue Ray discs, DVDs and CDs.

32 23. Pill press machine, encapsulating machine, and other tools or equipment
33 used to manufacture pills

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2 24. Cell Phones and other digital communication devices for evidence, fruits,
3 and/or instrumentalities of the above-referenced crimes, specifically:

4 a. Assigned number and identifying telephone serial number (ESN,
5 MIN, IMSI, or IMEI);

6 b. Stored list of recent received, sent, or missed calls;

7 c. Stored contact information;

8 d. Stored photographs and videos of narcotics, currency, financial
9 records (such as deposit slips and other bank records), RVs and other vehicles, firearms
10 or other weapons, evidence of the aforementioned crimes of investigation, and/or that
11 may show the user of the phone and/or coconspirators, including any embedded GPS
12 data associated with these photographs; and

13 e. Stored text messages that are evidence of the above-listed federal
14 crimes or that may identify the user of the seized phones and/or coconspirators,
15 including messages sent via messaging apps, including Wickr, Signal, WhatsApp, and
16 Telegram, or other similar messaging services where the data is stored on the telephone
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I, Joseph M. Parker, being first duly sworn on oath, depose and say:

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1 organizations, and have become familiar with the methods of operation of drug
2 traffickers and manufacturers, including, but not limited to: their methods of importing,
3 exporting, storing, concealing, and packaging drugs; their methods of transferring and
4 distributing drugs; their use of cellular telephones and telephone pagers; their use of
5 numerical codes, code words, and counter surveillance techniques; and other methods of
6 avoiding detection by law enforcement.

7 4. I am familiar with the various methods of packaging, delivering,
8 transferring, and laundering drug proceeds. Additionally, through training and
9 experience, I can identify illegal drugs by sight and texture. I am trained to use a field
10 test kit to identify the presumptive presence of controlled substances. I have become
11 familiar with common slang terms and codes used by drug traffickers and their associates
12 to refer to drugs, money, guns, vehicles, compartments, and other things related to their
13 drug trafficking. I have learned how they attempt to thwart law enforcement by using
14 code terms, multiple cell phones, concealed compartments, "stash houses," and other
15 means. I have become familiar with the ways in which drugs commonly are transported,
16 stored, and sold, and in what quantities and at what prices in this area, and how members
17 of a conspiracy communicate with each other. I am also familiar with common ways in
18 which drug traffickers attempt to profit from their illegal activities, by hiding drug
19 proceeds in various places to conceal the illegal source or their ownership, including
20 hiding and transporting bulk cash, sending funds through wire transfers or bank accounts
21 in other persons' names, or investing in assets placed in other persons' names.
22 Throughout my law enforcement career, I have spoken with, worked with, and gained
23 knowledge from numerous experienced federal, state, and local narcotics officers.

24 5. Because of my personal participation in this investigation and because of
25 information provided to me by other agents and officers, I am familiar with the facts and
26 circumstances of this investigation. My familiarity with this investigation is further
27 based on information relayed to me by other law enforcement personnel, discussions with
28 other experienced officers, detectives, and agents, review of law enforcement reports, and

1 interviews of witnesses. My experience in investigating drug offenders, my education,
2 my conversations with senior drug agents, and my specialized training formed a basis of
3 opinions and conclusions set forth below.

4 6. The facts in this affidavit and in the attached document, are based on my
5 training and experience, and information obtained from other agents, detectives, analysts,
6 and witnesses. The information outlined below is provided for the limited purpose of
7 establishing probable cause and does not contain all details or all facts of which I am
8 aware that relate to this investigation.

9 **PURPOSE OF THIS AFFIDAVIT**

10 7. This Affidavit is submitted in support of an application to search the
11 residence located at 17022 35th Ave S, SeaTac, Washington, also being identified as 17022
12 35th Ave S #B, SeaTac, Washington (hereinafter, the “**TARGET RESIDENCE**”), as
13 further described in Attachment A, attached hereto and incorporated by this reference as if
14 set forth fully herein.

15 8. As set forth below, there is probable cause to believe that the **TARGET**
16 **RESIDENCE** contains evidence, fruits, and instrumentalities of the following crimes:
17 distribution and possession with intent to distribute controlled substances in violation of
18 Title 21, United States Code, Sections 841(a)(1).

19 9. The information set forth in this Affidavit consists of information I have
20 gathered and observed firsthand through the course of this investigation to date, as well as
21 information relayed to me by other law enforcement officers, my review of law
22 enforcement reports, and interviews of witnesses. Since this Affidavit is being submitted
23 for the limited purpose of obtaining a search warrant, I have not included every fact known
24 to me concerning this investigation. I have set forth only the facts that I believe are essential
25 to establish the necessary foundation for the issuance of such warrant.

26 **SUMMARY OF PROBABLE CAUSE**

27 10. On January 20, 2022, agents attempted to conduct a buy/bust operation in
28 Seattle, WA, utilizing a Confidential Source (CS). Prior to the buy/bust operation

1 beginning, agents searched the CS's person and vehicle. CS's person and vehicle were
2 searched by HSI SA Clammer and HSI SA Hardin and found to be clear of weapons,
3 narcotics, money, and any other contraband.¹

4 11. The buy was set up through the CS speaking to a person in Mexico
5 identified as Hilario LUCERO-Espinoza. CS and LUCERO-Espinoza arranged for the
6 purchase of 15,000 fentanyl M30 pills and 20 pounds of methamphetamine for \$102,500.
7 CS did not speak with anyone locally prior to the meet as the arrangements were made
8 through LUCERO-Espinoza.

9 12. LUCERO-Espinoza told the CS that there would be two different couriers
10 arriving with different amounts of narcotics to provide to the CS. LUCERO-Espinoza
11 explained that the two couriers would be able to supply the previously agreed upon
12 amount of narcotics to the CS.

13 13. The CS told LUCERO-Espinoza that s/he did not want to divide their
14 money and provide it to two separate associates of LUCERO-Espinoza so s/he would
15 wait for both couriers to arrive at the meet location to obtain the full agreed upon amount
16 of narcotics prior to delivering any money to LUCERO-Espinoza's associates.

17 14. The controlled buy was initially set to be conducted at 16402 Military Road
18 S, Seattle, WA, 98188, but ultimately was set for a meet at the Safeway located at 4011 S
19 164th St, Seattle, WA, 98118. The Safeway is directly across the street from the original
20 meet location.

21 15. CS arrived at the meet location and contacted LUCERO-Espinoza to advise
22 him that CS was in the parking lot. At approximately 11:22 am, LUCERO-Espinoza and
23 CS spoke and CS was advised that an associate of LUCERO-Espinoza's would be
24 arriving within three minutes.

27 ¹ This Confidential Source has consistently provided reliable information in the past that has been independently
28 corroborated by investigators. CS has no criminal history. CS is working for immigration benefits and monetary
gain.

1 16. At approximately 11:24 am, a 2010 gray Volkswagen sedan WA/BTR7047
2 approached the CS's vehicle. Agents were in position to conduct surveillance and
3 observed CS exit her/his vehicle and approach the Volkswagen sedan. The CS got into
4 the Volkswagen sedan and met with the driver and sole occupant of the vehicle, later
5 identified as Jose Leonel GUICHO-Acosta, where s/he was able to confirm the presence
6 of what s/he believed to be methamphetamine and fentanyl pills.

7 17. GUICHO-Acosta appeared to be nervous and did not want to wait around
8 in the parking lot for the other courier to arrive. The CS exited the Volkswagen sedan
9 and contacted LUCERO-Espinoza to determine the wait time for the second courier.
10 Simultaneously, GUICHO-Acosta drove away from CS and left the parking lot traveling
11 southbound.

12 18. Agents followed GUICHO-Acosta. The CS confirmed the presence of
13 narcotics in the Volkswagen sedan. Once agents received confirmation of narcotics
14 within the vehicle, they initiated a traffic stop on the Volkswagen sedan. The
15 Volkswagen sedan pulled into a driveway at the same time agents activated their
16 emergency lights. Agents took GUICHO-Acosta into custody without incident. The
17 driveway that GUICHO-Acosta pulled into was at 17022 35th Ave S, SeaTac, WA, and is
18 at the front of two residences on this property, the second of which is the **TARGET**
19 **RESIDENCE**.

20 19. GUICHO-Acosta was handcuffed and searched incident to arrest. Three
21 keys were located on his person. GUICHO-Acosta was Mirandized in Spanish by a
22 proficient Spanish speaker (GS Dan Olson). GUICHO-Acosta acknowledged his rights
23 by shaking his head up and down, indicating he understood his rights. When asked if he
24 wanted to speak to agents, GUICHO-Acosta shook his head left and right, indicating he
25 did not want to speak.

26 20. A narcotics K9 alerted to presence of the odor of narcotics emitting from
27 the rear passenger side of the Volkswagen sedan. Agents searched the Volkswagen sedan
28 and located a black duffle bag in the rear passenger seat area of the vehicle that contained

1 large Ziploc bags holding clear, crystal-like substances as well as a cylindrical saran
2 wrapped package holding blue pills.

3 21. Based off my training and experience, I could immediately recognize the
4 clear, crystal-like substance to be packaged and appear as prepared for bulk
5 methamphetamine trafficking. I also could immediately recognize the blue pills to be
6 packaged and appear as prepared for bulk M30 fentanyl pill trafficking. The clear,
7 crystal-like substance field tested positive for methamphetamine. For officer safety
8 purposes, agents did not field test the suspected fentanyl pills, but as previously
9 mentioned, I could immediately recognize the blue pills to be commonly trafficked M30
10 fentanyl pills.

11 22. During the rest of the search of the Volkswagen sedan, agents also located
12 bulk cash in the glovebox of the vehicle.

13 23. The CS never met with a second courier after GUICHO-Acosta left the
14 parking lot. However, surveillance units in the area did observe a suspicious vehicle that
15 could have been associated to the second courier. Agents were unable to conduct a traffic
16 stop on the vehicle as it was lost in the midst of traffic. Agents are unable to verify if the
17 remaining portion of the narcotics would have actually been in this vehicle. The CS's
18 person and vehicle were searched by HSI SA Clammer and HSI SA Hardin and found to
19 be clear of weapons, narcotics, money, and any other contraband.

20 24. Agents made contact with a subject at the front house located on the same
21 lot (17022 35th Ave S #A, SeaTac, WA). This subject acknowledged that he had
22 previously seen the Volkswagen sedan parked at the **TARGET RESIDENCE** and that
23 he was aware the subject associated to the vehicle used to live at **TARGET**
24 **RESIDENCE** for about eight months, but had not seen him in the past month or so.
25 Agents showed this subject a picture of GUICHO-Acosta. The subject advised that
26 GUICHO-Acosta was the person he recognized as being a previous tenant of **TARGET**
27 **RESIDENCE** and associated with the Volkswagen sedan.
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1 25. The subject granted agents consent to search the front house located at
2 17022 35th Ave S, SeaTac, WA to include a narcotics K9 sniff. During the consent
3 search of the front house, agents did not locate anything indicative of drug trafficking and
4 the narcotics K9 did not alert on any locations within the front house.

5 26. After the arrest of GUICHO-Acosta, agents received information from one
6 or more sources (believed to be reliable based on reliable information provided in the
7 past) that LUCERO-Espinoza's couriers had counter surveillance established at the meet
8 location and were watching the initial meet occur.²

9 27. These reliable sources advised agents of information that was not available
10 to the original CS. For example, the original CS never left the parking lot of the meet
11 location unless s/he was followed by agents, so agents are aware of where the original CS
12 traveled to and from. However, one or more of the reliable sources were aware of the
13 fact that agents had stopped GUICHO-Acosta at the **TARGET RESIDENCE**. It is
14 believed this information was obtained when the counter surveillance drove past the
15 **TARGET RESIDENCE** during the traffic stop in the driveway and LUCERO-
16 Espinoza's associates were able to observe several agents as well as GUICHO-Acosta.

17 28. One or more of these reliable sources have stated that because counter
18 surveillance observed agents at **TARGET RESIDENCE**, that LUCERO-Espinoza's
19 TCO believed that the narcotics and/or money in the apartment was likely being seized as
20 well. This information was not passed along to the original CS until after agents cleared
21 the initial traffic stop and arrest of GUICHO-Acosta, so there has been some time during
22 which the **TARGET RESIDENCE** may have been accessible to key holders. However,
23 agents are currently surveilling **TARGET RESIDENCE** and have not observed anyone
24 enter the **TARGET RESIDENCE**.

25 29. Agents spoke to the landlord of the property who supplied a copy of the
26 lease agreement to **TARGET RESIDENCE** which indicates that the tenant is Gamaliel
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28 ² These reliable sources are also cooperating for immigration consideration.

1 LUCHI-Rivera. The landlord advised that even though the lease agreement indicates that
2 the only listed address is 17022 35th Ave S, SeaTac, WA, 98188, there is in fact a second
3 building, the **TARGET RESIDENCE**, on the back of the property on the same parcel.
4 The landlord advised that the only occupant that should be living in the **TARGET**
5 **RESIDENCE** is LUCHI-Rivera. The landlord advised that LUCHI-Rivera told him that
6 his “friend” was only staying at the **TARGET RESIDENCE** for a short time and was
7 not living there permanently. The landlord told LUCHI-Rivera that since there was a
8 breach of the contract, LUCHI-Rivera would have to clear out the **TARGET**
9 **RESIDENCE**. LUCHI-Rivera told the landlord that he would be able to come clean out
10 **TARGET RESIDENCE** by January 21, 2022.

11 **COMMON CHARACTERISTICS OF DRUG TRAFFICKING**

12 30. As a result of my training and experience, and based on my consultation with
13 other agents and law enforcement officers, I have an understanding of the manner in which
14 narcotics are distributed and the various roles played by individuals and groups in their
15 distribution. I have encountered and have become familiar with various tools, methods,
16 trends, paraphernalia, and related articles utilized by various traffickers in their efforts to
17 import, conceal, and distribute controlled substances. I am also familiar with the manner
18 in which drug traffickers use telephones, often cellular telephones, to conduct their
19 unlawful operations. I am also familiar with the manner in which drug traffickers will use
20 weapons to protect their drug activities and further its goals.

21 31. Based upon my training, experience, and conversations with other
22 experienced officers and agents, I know that:

23 a. Drug trafficking conspiracies usually take place over several months
24 or years, and continue to operate even when enforcement activity results in arrests
25 and/or seizures of drugs and/or money.

26 b. Persons involved in the distribution of controlled substances typically
27 will obtain and distribute drugs on a regular basis, much as a distributor of a legal
28 commodity would purchase stock for sale. Similarly, such drug dealers will

1 maintain an “inventory,” which will fluctuate in size depending upon the demand
2 for and the available supply of the product.

3 c. It is common for drug dealers to possess narcotics, drug paraphernalia,
4 and other items which are associated with the sale and use of controlled substances
5 such as scales, containers, cutting agents/substances, and packaging materials in
6 their residences, stash houses, storage units, garages, outbuildings and/or vehicles
7 on their property.

8 d. Drug traffickers often document aspects of their criminal conduct
9 through photographs or videos of themselves, their associates, their property, and
10 their product. Drug traffickers usually maintain these photographs or videos in their
11 possession.

12 e. It is a common practice for drug traffickers to maintain records
13 relating to their drug trafficking activities in their residences, stash houses, storage
14 units, garages, outbuildings and/or vehicles. Because drug traffickers in many
15 instances will “front” (i.e., sell on consignment) controlled substances to their
16 clients, or alternatively, will be “fronted” these items from their suppliers, such
17 record keeping is necessary to keep track of amounts paid and owed, and such
18 records will also be maintained close at hand so as to readily ascertain current
19 balances. These records include “pay and owe” records to show balances due for
20 drugs sold in the past (pay) and for payments expected (owe) as to the trafficker’s
21 suppliers and distributors, telephone and address listings of clients and suppliers,
22 and records of drug proceeds. These records are commonly kept for an extended
23 period of time.

24 f. Drug traffickers maintain books, records, receipts, notes, ledgers,
25 airline tickets, money orders, and other papers relating to the transportation and
26 distribution of controlled substances. These documents, whether in physical or
27 electronic form, are maintained where the traffickers have ready access to them.
28 These documents include travel records, receipts, airline tickets, auto rental

1 agreements, invoices, and other memorandum disclosing acquisition of assets and
2 personal or business expenses. I also know that such records are frequently
3 maintained in narcotics traffickers' residences, stash houses, storage units, garages,
4 outbuildings and/or vehicles.

5 g. Drug traffickers often maintain large amounts of US currency in order
6 to maintain and finance their ongoing illegal drug trafficking business.

7 h. It is common for drug dealers to secret drugs, currency and other
8 valuable items representing the proceeds of drug sales in secure locations within
9 their residences, stash houses, storage units, garages, outbuildings and/or vehicles
10 on the property in order to prevent the theft of such items by other persons or the
11 seizure of such items by law enforcement. These secure locations typically include
12 other residences also known as "stash houses," storage lockers, safes, portable safes,
13 vaults, or other locked containers (sometimes requiring passwords or codes to open),
14 as well as specially constructed concealed compartments such as those often found
15 in "load cars" used specifically to facilitate drug trafficking.

16 i. It is common to find papers, letters, billings, documents, and other
17 writings, which show ownership, dominion, and control of businesses, residences,
18 and/or vehicles in the residences, stash houses, storage units, garages, outbuildings
19 and/or vehicles of drug traffickers. Items of personal property that tend to identify
20 the person(s) in residence, occupancy, control, or ownership of the premises also
21 include canceled mail, deeds, leases, rental agreements, photographs, personal
22 telephone books, diaries, utility and telephone bills, statements, identification
23 documents, keys, financial papers, rental receipts and property ownership papers,
24 personal and business telephone and address books and telephone toll records, and
25 other personal papers or identification cards in the names of subjects involved in the
26 criminal activity being investigated.

27 j. Drug traffickers commonly have in their possession, that is, on their
28 person, at their residences, stash houses, storage units, garages, outbuildings and/or

1 vehicles, firearms, ammunition, and other weapons, which are used to protect and
2 secure their property. Persons who purchase and possess firearms also tend to
3 maintain the firearms and ammunition for lengthy periods of time. Firearms can be
4 acquired both legally and unlawfully, without official / traceable documentation.
5 Persons who acquire firearms from Federal Firearms Licensees, through deliberated
6 fraud and concealment, often will also acquire firearms from private parties and
7 other sources unknown to ATF. Firearms or ammunition are often secreted at other
8 locations within their residential curtilage, and the identification of these firearms
9 will assist in establishing their origins. Persons who purchase, possess, sell and/or
10 trade firearms or ammunition commonly maintain documents and items that are
11 related to the purchase, ownership, possession, sale and/or transfer of firearms,
12 ammunition, and/or firearm parts, including but not limited to driver's licenses,
13 telephone records, telephone bills, address and telephone books, canceled checks,
14 receipts, bank records and other financial documentation on the owner's person, at
15 the owner's residence, or in vehicles that they own, use, or have access to.

16 k. Drug traffickers use mobile electronic devices including cellular
17 telephones and other wireless communication devices in connection with their
18 illegal activities in order to set up meetings with coconspirators, conduct drug
19 transactions, or to arrange for the transportation drugs or drug proceeds. As
20 described below, such equipment often contains evidence of these illegal activities.

21 1. Traffickers of controlled substances commonly maintain addresses,
22 vehicles, or telephone numbers which reflect names, addresses, vehicles, and/or
23 telephone numbers of their suppliers, customers, and associates in the trafficking
24 organization, and it is common to find drug traffickers keeping records of said
25 associates in cellular telephones and other electronic devices. Traffickers often
26 maintain cellular telephones for ready access to their clientele and to maintain their
27 ongoing narcotics business. Traffickers frequently change their cellular telephone
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1 numbers to avoid detection by law enforcement, and it is common for traffickers to
2 use more than one cellular telephone at any one time.

3 m. Drug dealers use cellular telephones as a tool or instrumentality in
4 committing their criminal activity. They use them to maintain contact with their
5 suppliers, distributors, and customers. They prefer cellular telephones because, first,
6 they can be purchased without the location and personal information that land lines
7 require. Second, they can be easily carried to permit the user maximum flexibility
8 in meeting associates, avoiding police surveillance, and traveling to obtain or
9 distribute drugs. Third, they can be passed between members of a drug conspiracy
10 to allow substitution when one member leaves the area temporarily. Since cellular
11 phone use became widespread, many drug dealers I have contacted have used one
12 or more cellular telephones for his or her drug business. I also know that it is
13 common for drug traffickers to retain in their possession phones that they previously
14 used, but have discontinued actively using, for their drug trafficking business. Based
15 on my training and experience, the data maintained in a cellular telephone used by
16 a drug dealer is evidence of a crime or crimes. This includes the following:

17 i. The assigned number to the cellular telephone (known as the mobile
18 directory number or MDN), and the identifying telephone serial
19 number (Electronic Serial Number, or ESN), (Mobile Identification
20 Number, or MIN), (International Mobile Subscriber Identity, or
21 IMSI), or (International Mobile Equipment Identity, or IMEI) are
22 important evidence because they reveal the service provider, allow us
23 to obtain subscriber information, and uniquely identify the telephone.
24 This information can be used to obtain toll records, to identify
25 contacts by this telephone with other cellular telephones used by co-
26 conspirators, to identify other telephones used by the same subscriber
27 or purchased as part of a package, and to confirm if the telephone was
28 contacted by a cooperating source.

- 1 ii. The stored list of recent received, missed, and sent calls is important
2 evidence. It identifies telephones recently in contact with the
3 telephone user. This is valuable information in a drug investigation
4 because it will identify telephones used by other members of the
5 organization, such as suppliers, distributors and customers, and it
6 confirms the date and time of contacts. If the user is under
7 surveillance, it identifies what number he called during or around the
8 time of a drug transaction or surveilled meeting. Even if a contact
9 involves a telephone user not part of the conspiracy, the information
10 is helpful (and thus is evidence) because it leads to friends and
11 associates of the user who can identify the user, help locate the user,
12 and provide information about the user. Identifying a defendant's law-
13 abiding friends is often just as useful as identifying his drug-
14 trafficking associates. The information is also valuable in the firearms
15 context because it will identify telephones used by other individuals
16 who are part of illegal firearms transactions, and confirm the date and
17 time of contacts.
- 18 iii. Stored text messages are important evidence, similar to stored
19 numbers. Agents can identify both drug associates, and friends of the
20 user who likely have helpful information about the user, his location,
21 and his activities.
- 22 iv. Photographs on a cellular telephone are evidence because they help
23 identify the user, either through his or her own picture, or through
24 pictures of friends, family, and associates that can identify the user.
25 Pictures also identify associates likely to be members of the drug
26 trafficking organization. Some drug dealers photograph groups of
27 associates, sometimes posing with weapons and showing identifiable
28 gang signs. Also, digital photos often have embedded "geocode" or

1 GPS information embedded in them. Geocode information is typically
2 the longitude and latitude where the photo was taken. Showing where
3 the photo was taken can have evidentiary value. This location
4 information is helpful because, for example, it can show where
5 coconspirators meet, where they travel, and where assets might be
6 located.

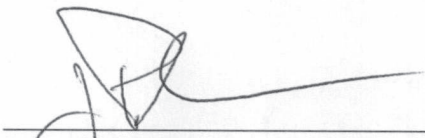
7 v. Based on my training and experience in investigating numerous
8 firearms possession and trafficking offenses, I am aware that when
9 individuals who are prohibited from legally possessing firearms seek
10 to acquire firearms, they typically seek to obtain the firearms from
11 private sellers. A common way in which these types of private firearm
12 sales, also referred to as "street sales," are transacted is via electronic
13 communications such as text message, email, and/or telephone calls.
14 I know that cell phones are frequently used to arrange such
15 transactions because of the flexibility and mobility they offer. I am
16 further aware that when individuals are offering items of value for
17 sale, such as firearms, it is common for them to take a photograph of
18 the item and send it via text message or email to an interested party
19 for their review, or to take a photograph of it to post/advertise it via
20 social media or the internet. During numerous investigations of
21 firearms sales, I have found it to be common for buyer's or seller's
22 cell phones to contain photographs of the firearms that were bought
23 or sold.

24 vi. Stored address records are important evidence because they show the
25 user's close associates and family members, and they contain names
26 and nicknames connected to phone numbers that can be used to
27 identify suspects.

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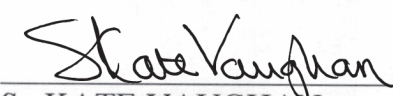
V. CONCLUSION

32. Based on investigation to date, summarized above, there is probable cause to conclude that there is evidence linked to drug trafficking offenses, specifically, distribution and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), located within **TARGET RESIDENCE**. There is also probable cause to conclude that the evidence, fruits, and instrumentalities of these offenses, as set forth in Attachment B, will be found in the **TARGET RESIDENCE**, described in Attachment A.



Joseph Parker
Special Agent
Drug Enforcement Administration

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone on the 20th day of January 2022.



S. KATE VAUGHAN
United States Magistrate Judge

ATTACHMENT A

PROPERTY TO BE SEARCHED

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location described below.

Residence

Target Residence: The Target Residence is a single-story house, beige in color, positioned on the same lot to the rear of a blue single-story house (17022 35th Ave S, SeaTac, WA). The Target Residence has a purple picnic table directly out front of the front door. The Target Residence does not have any numerical markings on the front of the building. The Target Residence has a gray front door facing to the south. The Target Residence is positioned to the east of the blue single-story house.



1 **ATTACHMENT B**

2 **(ITEMS TO BE SEARCHED AND SEIZED)**

3
4 This warrant authorizes the government to search for the following evidence,
5 fruits, and/or instrumentalities of Distribution and/or Possession of Controlled
6 Substances with Intent to Distribute, in violation of 21 U.S.C. § 841(a)(1):

7 1. Controlled Substances and controlled substance analogues.

8 2. Drug Paraphernalia and Instruments of Drug Trafficking: Items used, or
9 to be used, to store, process, package, use, and/or distribute controlled substances;
10 plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags,
11 chemicals or items used to test the purity and/or quality of controlled substances.

12 3. Drug Transaction Records: Documents such as ledgers, receipts, and
13 notes relating to the acquisition, transportation, and distribution of controlled
14 substances, however stored, including in digital devices.

15 4. Customer and Supplier Information: Items identifying drug customers
16 and drug suppliers, such as telephone records, personal address books, correspondence,
17 diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug
18 amounts and prices, and maps or directions.

19 5. Cash and Financial Records: Currency and financial records, such as
20 bank records, safe deposit box records and keys, credit card records, bills, receipts, tax
21 returns, and vehicle documents; records that show income and expenditures, net worth,
22 money transfers, wire transmittals, negotiable instruments, bank drafts, and cashier's
23 checks.

24 6. Photographs/Video: Photographs, video tapes, digital cameras,
25 surveillance cameras, and associated hardware/storage devices depicting property
26 occupants, friends and relatives of the property occupants, or suspected buyers or
27 sellers of controlled substances, controlled substances or other contraband, weapons,
28 and assets derived from the distribution of controlled substances.

7. Weapons, including firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled
substances, such as passwords, code books, cypher or decryption keys.

9. Property Records: Deeds, contracts, escrow documents, mortgage
documents, rental documents, and other evidence relating to the purchase, ownership,

1 rental, income, expenses, or control of the Target Residence, and similar records of
2 other property owned or rented.

3 10. Indicia of occupancy, residency, and/or ownership of assets such as utility
4 and telephone bills, canceled envelopes, rental records or payment receipts, leases, and
5 mortgage statements.

6 11. Evidence of storage unit rental or access such as rental and payment
7 records, keys and codes, pamphlets, contracts, contact information, directions, and
8 passwords.

9 12. Evidence of Personal Property Ownership: Registration information,
10 ownership documents, or other evidence of ownership of personal property such as
11 vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and jewelry;
12 evidence of international or domestic travel, hotel stays, and other evidence of
13 unexplained wealth.

14 13. Individual and business financial books, records, receipts, notes, ledgers,
15 diaries, journals, and all records relating to income, profit, expenditures, or losses, such
16 as:

17 a. Employment records: paychecks or stubs, lists and accounts of
18 employee payrolls, records of employment tax withholdings and contributions,
19 dividends, stock certificates, and compensation to officers.

20 b. Savings accounts: statements, ledger cards, deposit tickets,
21 register records, wire transfer records, correspondence, and withdrawal slips.

22 c. Checking accounts: statements, canceled checks, deposit tickets,
23 credit/debit documents, wire transfer documents, correspondence, and register records.

24 d. Loan Accounts: financial statements and loan applications for all
25 loans applied for, notes, loan repayment records, and mortgage loan records.

26 e. Collection account statements and other-related records.

27 f. Certificates of deposit: applications, purchase documents, and
28 statements of accounts.

g. Credit card accounts: credit cards, monthly statements, and
receipts of use.

h. Receipts and records related to gambling wins and losses, or any
other contest winnings.

i. Insurance: policies, statements, bills, and claim-related
documents.

j. Financial records: profit and loss statements, financial statements,
receipts, balance sheets, accounting work papers, any receipts showing purchases made,
both business and personal, receipts showing charitable contributions, and income and
expense ledgers.

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2 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's
3 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money
4 wrappers, stored value cards, and other forms of financial remuneration evidencing the
5 obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of
6 money.

7 15. All Western Union and/or Money Gram documents and other financial
8 documents evidencing domestic or international wire transfers, money orders, official
9 checks, cashier's checks, or other negotiable interests that can be purchased with cash,
10 including applications, payment records, money orders, and frequent customer cards.

11 16. Negotiable instruments, jewelry, precious metals, and financial
12 instruments.

13 17. Documents reflecting the source, receipt, transfer, control, ownership, and
14 disposition of United States and/or foreign currency.

15 18. Correspondence, papers, records, and any other items showing
16 employment or lack of employment.

17 19. Phone books, address books, any papers or documents reflecting names,
18 addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile,
19 and/or telex numbers, telephone records and bills relating to co-conspirators, sources of
20 supply, customers, financial institutions, and other individuals or businesses with whom
21 a financial relationship exists; telephone answering devices that record telephone
22 conversations and the tapes therein for messages left for or by co-conspirators for the
23 delivery or purchase of controlled substances or laundering of drug proceeds.

24 20. Safes and locked storage containers, and the contents thereof which are
25 otherwise described in this document.

26 21. Tools that may be used to open hidden compartments in vehicles, such as
27 paint, bonding agents, magnets, or other items that may be used to open/close said
28 compartments.

29 22. Digital computing devices, *e.g.*, desktop and laptop computers and table
30 devices; digital storage devices, *e.g.*, external hard drives and USB thumb drives, and;
31 optical and magnetic storage media, *e.g.*, Blue Ray discs, DVDs and CDs.

32 23. Pill press machine, encapsulating machine, and other tools or equipment
33 used to manufacture pills

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2 24. Cell Phones and other digital communication devices for evidence, fruits,
3 and/or instrumentalities of the above-referenced crimes, specifically:

4 a. Assigned number and identifying telephone serial number (ESN,
5 MIN, IMSI, or IMEI);

6 b. Stored list of recent received, sent, or missed calls;

7 c. Stored contact information;

8 d. Stored photographs and videos of narcotics, currency, financial
9 records (such as deposit slips and other bank records), RVs and other vehicles, firearms
10 or other weapons, evidence of the aforementioned crimes of investigation, and/or that
11 may show the user of the phone and/or coconspirators, including any embedded GPS
12 data associated with these photographs; and

13 e. Stored text messages that are evidence of the above-listed federal
14 crimes or that may identify the user of the seized phones and/or coconspirators,
15 including messages sent via messaging apps, including Wickr, Signal, WhatsApp, and
16 Telegram, or other similar messaging services where the data is stored on the telephone
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